

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
KIURYS MARTINEZ AND DELIELA MARTINEZ,

NOTICE OF
DEPOSITION

Plaintiffs,

-against-

1:13-CV-00447-R

TARGET CORPORATION,

Defendant.

COUNSELLORS:

PLEASE TAKE NOTICE, that pursuant to CPLR Article 31 the undersigned hereby demands to take the deposition of each party represented by you and/or any officers, agents or employees thereof having knowledge of and concerning all the relevant facts and circumstances in connection with the accident and/or claimed injury herein including negligence, liability, damages, affirmative defenses, denials and the like as set forth in the pleadings herein.

The said deposition will take place at the offices of Plaintiff's attorneys, TROLMAN, GLASER & LICHTMAN, P.C., 777 Third Avenue, New York, New York, 10017, at 10:00 A.M. o'clock in the forenoon on September 17, 2013.

The said persons to be examined are required to produce at such examination all memoranda, reports, diagrams, measurements, books, notes, notations, records, memoranda, supply records, inventory records, accident reports, daily logs, daily work records, photographs, documents, correspondence, maps, charts, diagrams and other writings, papers and other materials in the

possession of this defendant and relevant to the issues herein.

In the event you cannot produce any of the persons to be examined in compliance with this notice, will you please advise us immediately so that arrangements can be made for a time and place agreeable to all parties.

Dated: New York, New York
August 13, 2013

Yours, etc.,

BY: MICHAEL A. MADONNA
TROLMAN, GLASER & LICHTMAN, P.C.
Attorneys for Plaintiff
777 Third Avenue
New York, NY 10017
(212) 750-1200

TO:

Fishman McIntyre P.C.
Attorneys for Defendant(s)
TARGET CORPORATION
44 Wall Street, 12th Floor
New York, NY 10005
(212) 461-7190

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
KIURYS MARTINEZ AND DELIELA MARTINEZ,

Plaintiffs,

-against-

TARGET CORPORATION,

NOTICE DECLINING
OF SERVICE VIA FAX
OR OTHER
ELECTRONIC MEANS

1:13-CV-00447-R

Defendant.

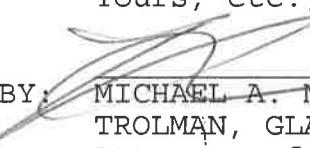
S I R S :

PLEASE TAKE NOTICE, that pursuant to CPLR Rule 2103(b)(5), the undersigned hereby give notice that no papers to be served shall be accepted by transmittal via electronic means, facsimile (Fax) machine, telecopier, and the like. No such telephone number or station for acceptance of service of papers is included in the undersigned's address block on these papers, and any papers so served shall be rejected and deemed a nullity by the undersigned.

See, e.g., Levin v. Levin, 609 N.Y.S.2d 547 (Sup. Ct. Nassau Cty, 1994).

Dated: New York, New York
August 13, 2013

Yours, etc.,

BY: 
MICHAEL A. MADONNA, ESQ.
TROLMAN, GLASER & LICHTMAN, P.C.
Attorneys for Plaintiff(s)
777 Third Avenue
New York, NY 10017
(212) 750-1200

TO:

Fishman McIntyre P.C.
Attorneys for Defendant(s)
TARGET CORPORATION
44 Wall Street, 12th Floor
New York, NY 10005
(212) 461-7190

STATE OF NEW YORK }
 } ss.:
COUNTY OF NEW YORK }

FRANCIS TAVERAS, being duly sworn, deposes and says:

Deponent is not a party to the action, is over the age of 18 years and resides at Kings, New York.

That on the 13 day of August, 2013, deponent served the within NOTICE OF DEPOSITION AND NOTICE DECLINING OF SERVICE VIA FAX OR OTHER ELECTRONIC MEANS upon the following, at the addresses designated by said attorneys for that purpose, by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in a post office or official depository under the exclusive care and custody of the United States Postal Service, within the State of New York:

Fishman McIntyre P.C.
44 Wall Street, 12th Floor
New York, NY 10005
(212) 461-7190


FRANCIS TAVERAS

Sworn to before me this
13 day of August, 2013



Notary Public

Maggie Castillo
Commissioner of Deeds
City of New York - No. 2-9560
Certificate Filed in Kings County
Commission Expires Nov. 1, 2014

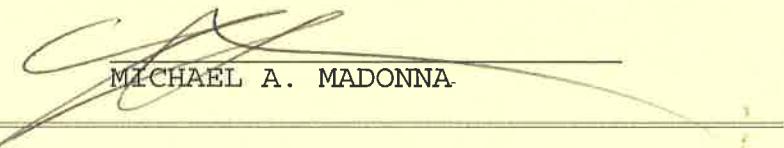
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KIURYS MARTINEZ AND DELIELA MARTINEZ, : 1:13-CV-00447-R (MAM) 2965
Plaintiff, :
: NOTICE OF DEPOSITION AND
- against - : NOTICE DECLINING OF
: SERVICE VIA FAX OR OTHER
: ELECTRONIC MEANS
TARGET CORPORATION, :
Defendant. :

NOTICE OF DEPOSITION AND NOTICE DECLINING
OF SERVICE VIA FAX OR OTHER ELECTRONIC MEANS

TROLMAN, GLASER & LICHTMAN, P.C.
Attorneys for Plaintiff(s)
777 Third Avenue
New York, New York 10017
(212) 750-1200
Fax: (212) 980-4011

To:
Attorney(s) for

The signature below shall constitute the signature required pursuant to NYCRR Section 130-1.1-a and pertains to all of the enclosed documents: NOTICE OF DEPOSITION AND NOTICE DECLINING OF SERVICE VIA FAX OR OTHER ELECTRONIC MEANS


MICHAEL A. MADONNA

PLEASE TAKE NOTICE
NOTICE OF

ENTRY



that the within is a (certified) true copy of a
entered in the office of the Clerk of the within named
Court on 20 .

NOTICE
OF
SETTLEMENT

that an Order of which the within is a true copy will be
presented to the Hon. , one of the
judges of the within named Court, on , 20



Dated:

TROLMAN, GLASER & LICHTMAN, P.C.
Attorneys for Plaintiff(s)
777 Third Avenue
New York, New York 10017
(212) 750-1200
Fax: (212) 980-4011